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**From:** McCoy, Erin  
**Sent:** Mon 2/6/2017 7:49:12 PM  
**Subject:** Dico Discussion of Alternatives

Hylton, I'm sending you a summary of the alternatives that we are going to look at in the two focused feasibility studies (FFS) for the Des Moines TCE site. After considerable review, it was determined by R7 RCRA staff that some of the building debris would be classified as a listed waste and some would not. However, for the debris that would not, we would still need to make sure the material was not a hazardous material based on characterization. The sediments in the South Pond Area (SPA) also need to be analyzed to see if they are hazardous based on characterization.

Based on this information, the alternatives being evaluated in the FFS are below. Please let me know if you have any questions. I'm moving forward to finish the FFS with these alternatives. Thanks!

### **SPA**

SP Alternative #1 – No action

SP Alternative #2 – Dredge pond sediment and restore pond

- Water would be drained to allow for dredging
- Sediments would be dredge and characterized for proper disposal
  - Assume 50-100% of sediments are hazardous material for disposal evaluation
- Wetland restoration

SP Alternative #3 – Abandon Pond and fill in

- Water would be drained and disposed of offsite (treated if necessary)
- Clean fill would be used to fill in the SPA
- A RCRA C cap would be placed over the area
- Money would be provided to the wetland mitigation program to rebuild wetlands in another area

## **Buildings**

Building Alternative #1 – No action. This remedy will consist of the ongoing remedy selected in the 1997 ROD and require future

maintenance of the epoxy coating and restriction of exposure.

Building Alternative #2 – Building demolition with off-site disposal. This remedy would be composed of several stages:

- Asbestos removal
- Building demolition and slab removal
  - The production building does not contain characteristic hazardous waste based on June 2016 samples and can be disposed of at a local appropriate landfill (assuming insulation does not have PCBs).
  - Metal would be decontaminated and sent to a local landfill for disposal as non-hazardous waste or can be recycled.
  - The insulation would go to a RCRA Subtitle C landfill for disposal due to PCB concentrations > 50 ppm.
  - All the contaminated slab debris associated with building 4 is a listed hazardous waste and needs to be disposed of at a RCRA Subtitle C landfill.
  - The porous building material would be analyzed to determine if it meets the requirements for characteristic hazardous waste based on pesticide contamination. The PCB contamination in the porous building material is not a factor since it is classified as bulk product waste and is less than < 50 ppm.
  - Characteristic hazardous waste would be sent to a RCRA Subtitle C landfill for disposal, which may include treatment.
  - The remaining material that is not classified as a characteristic hazardous waste would be disposed of at a local appropriate landfill.
  - For the purposes of costs, it will be assumed that 25 to 75% of Buildings 1, 2, and 3, and the slabs from building 5 and the maintenance building are hazardous waste to allow for a cost range to be determined.
- An asphalt cap would be placed over the former building foundations to prevent exposure to contaminated soil and fill located under the buildings. Non-hazardous building

materials could be spread across the site or in low lying areas to prevent fill from being brought in (if possible).

- Institutional controls would be put into place to prevent exposure to the contamination remaining on site in the soil and fill below the asphalt cap and exclude residential use.

Building Alternative #3 – Building demolition with onsite containment. This remedy would be composed of several stages and includes an Area of Contamination:

- Asbestos removal
- Building demolition
  - The Production Building does not contain characteristic hazardous waste based on June 2016 samples and can be disposed of at a local appropriate landfill or spread on site (assuming insulation does not have PCBs).
  - Metal would be decontaminated and sent to a local landfill for disposal as non-hazardous waste or recycled.
  - The insulation would go to a RCRA Subtitle C landfill for disposal due to PCB concentrations.
    - The PCB source material would be removed from the site because the concentration is > 50 ppm and while it is technically possible to leave it in the AOC, it would be impossible to show that leaving the source material on site would not pose unacceptable risk to human health or the environment if contained in place.
  - The location of the AOC would be determined.
  - The porous building material would be crushed and spread across the AOC. Since the AOC would include the former building locations, the foundations would not need to be removed and the building material could be spread over the foundation slabs. Building debris would need to be segregated and tested using TCLP. Non-characteristic waste would be spread across the northern portion of the site. Hazardous waste would be consolidated in the southern portion of the site.
    - A RCRA Subtitle C cap would be placed over the southern portion of the AOC (where hazardous waste is consolidated) to prevent exposure to contamination.
    - An asphalt cap would be placed over the northern portion of the site.
- Institutional controls would be put into place to prevent exposure to the

contamination remaining on site in the soil and fill below the asphalt cap and exclude residential use.

Special considerations to be added to the FFS:

1. Need to add something stating that the location of onsite disposal may vary due to redevelopment, but that any additional costs associate with changing the location of disposal would be the responsibility of the future developer.
2. Include the contingency that we discussed about using the building material to fill in the South Pond Area instead of buying fill if we choose those two remedies. Point out the overall cost savings.



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